

EXHIBIT G

1 ANDREY KUZENNY
2 1687 Stone Canyon Rd.
3 Los Angeles, CA 90077

4 In Pro Per

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6 UNITED STATES BANKRUPTCY COURT
7 EASTERN DISTRICT OF WASHINGTON

8 18-03197 - FPC11

9 In re

10 GIGA WATT, INC.,

11 Debtor.

) Case No. 18-03187-T1

) Chapter 11

) DECLARATION OF ANDREY
) KUZENNY IN RESPONSE TO
) "DECLARATION OF PAMELA M.
) EGAN IN SUPPORT OF CHAPTER 11
) TRUSTEE'S (I) JOINDER IN UNITED
) STATES TRUSTEE'S OBJECTION TO
) FEE APPLICATION AND (II)
) OBJECTION TO APPLICATION FOR
) AWARD OF COMPENSATION"

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1 I, Andrey Kuzenny, hereby declare as follows:

2 1. I have personal knowledge of the facts set forth below and, if called to testify,
3 would and could competently testify thereto.

4 2. Prior to the bankruptcy filing of Giga Watt, Inc. ("GW"), I worked as the Chief
5 Coordinator of GW. My duties focused primarily on customer support with GW's clients. I
6 lived in Los Angeles and did not spend time in GW's offices in Washington.

7 3. David Carlson, one of the co-founders of GW, acted as the Chief Executive
8 Officer of GW and was responsible for management of the company. Timur Usmanoff acted as
9 Chief Financial Officer of GW and was responsible for GW's financial matters. Shortly prior to
10 the bankruptcy filing, Mr. Carlson's and Mr. Usmanoff's relationships with GW came to an end.
11 With Mr. Carlson's and Mr. Usmanoff's departure, others responsibilities for management and
12 finances of GW left as well. GW was not able to employ anyone to take over such duties.

13 4. When GW was forced to commence this case, I was the last remaining officer to
14 assist the Debtor in this process. As a result, I was designated as the authorized agent for GW.

15 5. At GW's meeting of creditors on 16 January 2019, as well as prior to the meeting,
16 I advised parties in interest that I was not involved in financial accounting of GW and did not
17 maintain GW's financial records or documentations.

18 6. I did not attend GW's first meeting of creditors because GW's bankruptcy
19 counsel, Timothy Fisher, advised me that he is seeking to withdraw as counsel and that the
20 meeting will not go forward and will be continues. Based on such advice, I did not attend the
21 meeting.

22 7. I did attend the second meeting of creditors and testified to the best of my
23 knowledge. I testified that I was not involved in financial accounting and did not possess
24 information related thereto.

25 8. Prior to the third meeting of creditors, I advised Ms. Egan that I had a pre-
26 arranged medical procedure in Germany and would be gone February 3, 2019 through February
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1 12, 2019. I was not able to reschedule or cancel my medical treatment and advised Ms. Egan in
2 advance of this.

3 9. After the appointment of the Chapter 11 trustee, I advised Ms. Egan that I would
4 use my best efforts to answer her questions and assist her in her inquiries. In that respect, I was
5 involved in numerous telephone conversations with Ms. Egan to respond to her questions,
6 including with my counsel on the phone. I again advised Ms. Egan that I do not have financial
7 information for GW that she seeks. While it appears to have frustrated her, I cannot provide to
8 her information that I lack.

9 10. Ms. Egan asked me for login credentials for GW's servers. I provided her with
10 such information, which I specially requested for Ms. Egan from the developers. Ms. Egan
11 advised me that she was able to access some records but not everything. I offered to be online
12 with her when she attempted to access the information. She accepted my offer and we went
13 online on 04 February 2019, at which time I guided her through the process and she advised me
14 that she obtained access to the information she sought.

15 11. On 14 February 2019, I learned that funds were taken out of about 30 client
16 personal "wallets" at GW, including my personal wallet. I contacted GW's developers to
17 understand what occurred. The developers traced the hack to a login utilizing the administrative
18 credentials I provided to Ms. Egan. I advised her of the foregoing. In fact, based on prior
19 experience, I know that hackers are always attempting to hack cryptocurrency accounts and
20 GW's development team worked hard, and was successful, in preventing such hacks. This has
21 never occurred prior to providing the credentials to Ms. Egan. By the information I received
22 from GW's developers, the password has not changed since Ms. Egan received it. Moreover, the
23 2FA (2 Factor Authentication) was not activated, which, according to the developers, is
24 inappropriate behavior in computer security safety and resulted in customer funds being
25 compromised.

26 12. Ms. Egan also asked me what happened to the approximately \$200,000 allegedly
27 missing from operating accounts. I advised her that I have no idea what she was referring to and,
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1 to the best of my knowledge, there were no missing funds or inappropriate activity. I asked for
2 information or details to assist me in trying to find out what she is referring to. To date, I have
3 received no information from Ms. Egan.

4 I declare and verify under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct to the best of my knowledge.

6 Executed on this 7th day of March 2019 at Los Angeles, California.

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Andrey Kuzenny

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